

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
Civil Action No. 1:18-cv-507**

Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, and for the reasons stated in the corresponding Joint Motion for Entry of Protective Order, Plaintiff Kathryn McHutchison (“Plaintiff”) and Defendant Spencer Schar (“Defendant,” collectively, the “Parties”) respectfully request that the motion be granted. The Parties submit this Joint Motion for good cause and in the interests of justice to facilitate discovery in this matter.

WHEREFORE, the Parties respectfully request that the Joint Motion for Entry of Protective Order be GRANTED, and that the Court review the Parties' Proposed Protective Order (attached to the Joint Motion as **Exhibit A**) and competing proposals from the parties for Paragraphs 6(c) and 7, and thereafter enter a Protective Order in this action

This the 28th day of February, 2019.

/s/ John R. Taylor
Robert E. Zaytoun
N.C. State Bar No. 6942
rzaytoun@zaytounlaw.com
Matthew D. Ballew
N.C. State Bar No. 39515
mballew@zaytounlaw.com
John R. Taylor
N.C. State Bar No. 43248
jtaylor@zaytounlaw.com

/s/ Justin N. Outling
Kearns Davis
N.C. State Bar No. 22014
kdavis@brookspierce.com
John W. Ormand III
N.C. State Bar No. 14160
jormand@brookspierce.com
Justin N. Outling
N.C. State Bar No. 38409
joutling@brookspierce.com

ZAYTOUN LAW FIRM, PLLC
3130 Fairhill Drive, Suite 100
Raleigh, NC 27612
Tel: 919-832-6690
Fax: 919-831-4793

*Attorneys for Plaintiff Kathryn
McHutchison*

Shepard D. O'Connell
N.C. State Bar No. 50652
soconnell@brookspierce.com
BROOKS, PIERCE, MCLENDON,
HUMPHREY & LEONARD, LLP
P.O. Box 26000
Greensboro, NC 27420
Telephone: (336) 271-3174

Attorneys for Defendant Spencer Schar

CERTIFICATE OF SERVICE

I hereby certify that on the date indicated below I electronically filed the foregoing document(s) with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Kearns Davis
N.C. State Bar No. 22014
John W. Ormand III
N.C. State Bar No. 14160
Justin N. Outling
N.C. State Bar No. 38409
Shepard D. O'Connell
N.C. State Bar No. 50652
Brooks Pierce McLendon Humphrey & Leonard, LLP
230 North Elm Street
2000 Renaissance Plaza
Greensboro, NC 27420
Telephone: (336) 373-8850
Email: kdavis@brookspierce.com
Email: jormand@brookspierce.com
Email: joutling@brookspierce.com
Email: soconnell@brookspierce.com

This the 28th day of February, 2019.

ZAYTOUN LAW FIRM, PLLC

/s/ John R. Taylor
John R. Taylor
Attorneys for Plaintiff Kathryn McHutchison